



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SKW/NCG/GMR
F. #2023R00922

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 20, 2025

By FedEx, E-mail, and ECF

Avraham C. Moskowitz, Esq.
Moskowitz Colson Ginsberg & Schulman
80 Broad Street, Suite 1900
New York, NY 10004
Email: amoskowitz@mcgsllp.com

Re: United States v. Asif Merchant
Criminal Docket No. 24-362 (EK)

Dear Mr. Moskowitz:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being provided on an external hard drive. The government requests reciprocal discovery from the defendant. The discovery is being produced pursuant to the Protective Order signed by counsel and entered by the Court on November 7, 2024. ECF No. 22.

The government is providing the following:

- FBI reports, Bates-stamped AM_004957 through AM_005019;
- Recordings of audio calls between the defendant and the CHS, Bates-stamped AM_005020 through AM_005082;
- Audio call reports, Bates-stamped AM_005083 through AM_005109;
- FBI surveillance reports, Bates-stamped AM_005110 through AM_005360;
- CHS phone export, Bates-stamped AM_005361, which has been marked **ATTORNEYS EYES ONLY**;
- Video recordings of the defendant, Bates-stamped AM_005362 through AM_005376; and

- Cellebrite extractions and communications including the defendant, Bates-stamped AM_005377 through AM_008296.

The dates associated with the video files are attached as Exhibit A. The dates associated with the audio call files are attached as Exhibit B. The identifiers of the relevant Cellebrite extraction reports are attached as Exhibit C.

As previously stated, you may examine the physical evidence discoverable under Rule 16, including original documents and electronic devices, by contacting the undersigned Assistant United States Attorneys to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/
Sara K. Winik
Nina C. Gupta
Gilbert M. Rein
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)